

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE PROVISION OF OPERATOR SERVICES
BY AMERICALL SYSTEMS OF LOUISVILLE

)
) CASE NO. 89-132

O R D E R

IT IS ORDERED that AmeriCall Systems of Louisville ("AmeriCall") shall file the original and 12 copies of the following information with the Commission, with a copy to all parties of record. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include in each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible.

The information requested is due no later than June 21, 1989. If the responses to questions 4 and 5 of the May 25, 1989 Commission request as compelled herein cannot be provided by this date, a motion for an extension of time must be submitted stating the reasons for the delay and the date by which the information can be furnished. Such motion will be considered by the Commission. The responses to all other questions should be answered by the date requested because of the need for the information prior to the June 26, 1989 hearing scheduled in this proceeding. After a

review of AmeriCall's responses filed June 5, 1989 and June 12, 1989 the Commission finds that AmeriCall has failed to completely and adequately respond to Items 1, 3(b), 3(c), 4, 5, and 10 of the Commission's May 25, 1989 request. The Commission is also of the opinion that additional requests for information are necessary. Therefore, the Commission, on its own motion, hereby ORDERS AND COMPELS AmeriCall to respond completely by June 21, 1989 to the following questions that were not adequately answered in AmeriCall's June 5, 1989 and June 12, 1989 responses and to the supplemental request.

1. Provide a complete and accurate listing of all customer accounts to which AmeriCall provides operator services which includes name of customer and service address.

AmeriCall's response to this item is that it provides operator services to all of its residential and business customers, which number over 10,000. Also, AmeriCall indicates that it provides operator services to its customers through an affiliated company, AmeriCall Dial 0 Services, Inc. ("Dial 0"). Further, AmeriCall filed an exhibit for which it requested confidential treatment showing aggregate information about its customer accounts.

AmeriCall's response is not responsive. Presumably, AmeriCall maintains customer records and it or an affiliated company bill customers for services rendered. Therefore, the requested information should be available and AmeriCall should be able to tabulate the information through automated or manual means. However, in order to narrow the scope of the request, the

Commission will rephrase it to require the following information be produced:

Provide a complete and accurate listing of all "0+" only customer accounts to which AmeriCall or an affiliated company has billed operator service charges during the most recent available 30-day billing cycle. Include the name and service address associated with each such customer account. A description of the type of company will not substitute providing the company's name. Also, affiliated company includes but is not limited to Dial O/Vericall.

3. b. Describe how calls are transported from the customer's premises to the operator services centers, including identification of AmeriCall's switching locations and identification of services and providers of the services being resold.

AmeriCall's response is a generic discussion of reseller and operator services operations, whereas the question requested specific information. Provide the specific information requested, to include the following:

A. Specific information about the facilities and/or services used by AmeriCall to transport calls from the customer's premises to AmeriCall's originating point-of-presence, such as the types of access utilized (Feature Group A, B, or D, special access, WATS, etc.) and identification of the local exchange carriers from whom such access and/or services is purchased.

B. Identify the location of all AmeriCall's switching locations or points-of-presence used to provide intrastate services.

C. Specific information concerning the facilities and/or services used to transport traffic from AmeriCall's originating points-of-presence to the Louisville switch, including the identity of the carriers from whom such facilities and/or services are obtained.

D. Specific information concerning the facilities and/or services used to bridge operators onto a call placed over the AmeriCall network.

3. c. Provide a description of how such calls are transported to final termination points.

As with the response to Item 3b, AmeriCall's response is a generic discussion. Provide specific information concerning the facilities and/or services used to terminate calls.

4. With respect to the intrastate long distance basic rates for operator-assisted telephone calls specified at page 6.3 of AmeriCall's tariff, provide minutes billed and revenues billed for each mileage band during each rate period since May 15, 1988. To the extent possible disaggregate minutes billed and revenue billed between inter- and intraLATA markets.

AmeriCall's response to this item is that it does not maintain or report information on its services on a separated basis.

AmeriCall's response is not responsive. As elsewhere, presumably, AmeriCall maintains customer records and it or an affiliated company bill customers for services rendered. Therefore, the requested information should be available and AmeriCall should be able to tabulate the information through automated or manual means. However, in order to narrow the scope to the request, the Commission will limit it to the most recent available 30-day billing cycle.

5. With respect to operator service charges specified at page 6.5 of AmeriCall's operator services tariff, provide messages billed and revenues billed for each operator service option since May 15, 1988. To the extent possible disaggregate messages billed and revenues billed between inter- and intraLATA markets.

AmeriCall's response to this item is that it does not maintain or report information on its services on a separated basis.

AmeriCall's response is not responsive. As elsewhere, presumably, AmeriCall maintains customer records and it or an affiliated company bill customers for services rendered. Therefore, the requested information should be available and AmeriCall should be able to tabulate the information through automated or manual means. However, in order to narrow the scope of the request, the Commission will limit it to the most recent available 30-day billing cycle.

10. With respect to AmeriCall's operator services tariff at page 6.1, indicate whether AmeriCall has the technical ability to block intraLATA and local operator-assisted calls under each dialing method.

AmeriCall's response to this item is that it does not need the technical ability to block intraLATA operator-assisted calls and that the cost of blocking operator-assisted local calls does not warrant blocking.

AmeriCall's response is not responsive. The request requires an affirmative or negative response, which AmeriCall did not provide. Therefore, the Commission reiterates this request item and requires a thorough explanation for a negative response.

Supplemental Request

Please reference AmeriCall's responses to the Commission's May 25, 1989 Data Request.

1. In AmeriCall's response to Item 2 it stated that AmeriCall has contracted directly with only one customer, then stated that all operator-assisted services customers who are not otherwise customers of AmeriCall had entered into service arrangements with AmeriCall through an affiliated company, Dial 0.

a. Discuss fully what is meant by the term "service arrangements." Does this term refer to contracts between any affiliate of AmeriCall included but not limited to VeriCall and/or Dial 0 for the provision of operator-assisted services?

b. Provide a copy of all current contracts entered into with any business, institution, and/or corporation for the provision of operator services by all of AmeriCall's affiliates. Affiliate includes but is not limited to Dial 0/Vericall. This request is limited to contracts which affect intrastate business.

2. In its response to Item 2 of the May 25, 1989 request AmeriCall stated that it had contracted directly with only one customer. Explain why AmeriCall has not followed the procedures established in 807 KAR 5:011, Section 13 concerning such contract and any other contract into which that or any affiliate may have entered which affect intrastate business. Also provide the name, address, and telephone number for a contact person from the organization with which AmeriCall has contracted.

3. The response to Item 1 indicates that AmeriCall currently contracts with Dial 0 to provide operator-assisted services to AmeriCall's customers, whereas the response to Item 3, "Confidential" Exhibit C, indicates that AmeriCall utilizes the operator services of another named entity.

a. Reconcile these two responses. Are two separate operator services providers involved, or is it that AmeriCall Dial 0 is provided operator-assisted services by the other named entity? Explain thoroughly the relationship of these two entities and AmeriCall.

b. Provide copies of all contracts or any other documents containing the terms of agreement between AmeriCall and AmeriCall Dial 0, as well as AmeriCall and the entity named in Confidential Exhibit 3.

4. Reference the response to Item 2, Supplement to "Confidential" Exhibit B, letter from AmeriCall, paragraph entitled "Facilities."

a. Identify the ownership of these facilities.

b. Provide copies of the contracts, tariffs, or any other documents that contain the terms of the agreements between AmeriCall and the owners of these facilities.

5. Identify AmeriCall Long Distance and its relationship to AmeriCall. In addition, provide the Articles of Incorporation for AmeriCall Long Distance.

6. Reference the response to Item 9. The response states in part:

In the event that the end-user makes a local call, that call is billed at the appropriate LEC tariff rate. The billing method is such that the call record, when priced out utilizing the vertical and horizontal coordinates, would indicate that there is insufficient mileage and therefore no applicable charge for transport, that is, no long-distance charge.

a. Provide an explanation of AmeriCall's rationale that mileage can determine a local call. For example, do all

exchanges in a local calling area utilize the same rate center, without exception?

b. Provide evidence, such as copies of customer bills, to support AmeriCall's claim that if "AmeriCall, when rating a call, realizes that it has completed an operator-assisted local call, the end user is not charged more than he would have paid if the LEC had handled the call."

7. Provide a complete explanation of how AmeriCall handles emergency calls, specifically "0-."

8. a. Provide the qualifications of AmeriCall's witness, Mr. Michael Stinson.

b. Is Mr. Stinson authorized to testify on behalf of AmeriCall Systems of Louisville, Inc. or only for Dial 0? If he is not so authorized, provide the name and qualifications for the witness(es) who will be so authorized to answer policy and technical questions on behalf of AmeriCall Systems of Louisville, Inc.

Done at Frankfort, Kentucky this 15th day of June, 1989.

PUBLIC SERVICE COMMISSION


For The Commission

ATTEST:

Executive Director